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11	UNITED STATES DISTRICT COURT		
12	FOR THE EASTERN DIS	TRICT OF CALIFORNIA	
13			
14	RACHAEL NAVARRO, individually		
15	and on behalf of all others similarly situated,		
16	·	Case No. 2:21-cv-01002-JAM-DMC	
17	Plaintiff,	UNOPPOSED SECOND	
18	v.	MOTION FOR EXTENSION OF	
19	JUSTFAB, LLC d/b/a JUSTFAB, a	TIME FOR JOINT STATUS REPORT AND RELATED	
20	Delaware limited liability company,	DEADLINES	
21	Defendant.		
22			
23	Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Plaintiff Rachael Navarro ("Navarro"		
24	or "Plaintiff"), by and through her counsel, hereby files this Unopposed Second		
25	Motion for Extension of Time for Joint Status Report and Related Deadlines.		
26	Plaintiff respectfully moves the Court for a thirty-one (31) day extension to		
27	December 27, 2021 for the Parties to file a Joint Status Report, as well as any		
28			

related deadlines under Rule 16, Rule 26, and Local Rule 240. In support of the motion, Plaintiff states as follows:

- 1. On June 4, 2021, Plaintiff filed a putative class action complaint ("Complaint") against Defendant JustFab, LLC d/b/a JustFab ("JustFab" or "Plaintiff"). (Dkt. 1.) On June 9, 2021, JustFab was served with the Complaint and Summons (dkt. 7).
- 2. Defendant has retained counsel in this matter, and counsel for the Parties have been in contact regarding the facts of the case. In light of these discussions, Plaintiff previously requested extensions to Defendant's deadline to respond to the complaint.
- 3. The Parties have worked cooperatively to share information that may result in early resolution of this matter after further factfinding. Such factfinding is in progress, and Plaintiff is currently waiting to receive relevant records from a third-party carrier regarding the text messages alleged in this case.
- 4. Plaintiff was previously informed by the carrier that records would be provided prior to November 26, 2021—the current deadline to file a Joint Status Report—but due to a personnel change, production of the requested records has been delayed. Plaintiff expects to receive the records prior to December 27, 2021, and such records will play a critical role in determining how the Parties may proceed in this matter.
- 4. Plaintiff hereby requests an additional thirty-one (31) days for the parties to continue this factfinding and evaluate records prior to filing a Joint Status Report. Counsel for Plaintiff is in contact with the aforementioned third party regarding the records necessary to evaluate Plaintiff's claims, and the additional time will permit counsel for Plaintiff to receive and assess such records and determine whether an early resolution of this matter may be achieved.

1	5. Good cause exists for this request, and the extension of time requested	
2	will not cause prejudice to either Party or the Court. Further, this extension is not	
3	sought for dilatory reasons or any other improper purpose. Plaintiff previously	
4	moved for, and the Court granted, one extension regarding the Joint Status Report	
5	or any deadlines under Rule 16, Rule 26, or Local Rule 240.	
6	6. Plaintiff's counsel has conferred with counsel for Defendant on this	
7	request and Defendant does not oppose the requested relief.	
8	WHEREFORE, Plaintiff Rachael Navarro respectfully requests that the Court	
9	enter an order granting the requested extension of time for the Parties to file a Joint	
10	Status Report up to and including December 27, 2021, and for any other relief the	
11	Court deems necessary and just.	
12		Respectfully submitted,
13	Detad: November 24, 2021	DACHAEL NAVADDO individually and
14	Dated: November 24, 2021	RACHAEL NAVARRO , individually and on behalf of all others similarly situated,
15		Ru. /s/ Stanhan A. Klain
16		By: /s/ Stephen A. Klein One of Plaintiff's Attorneys
17		Rebecca Davis (SBN 271662) rebecca@lozeaudrury.com
18		LOZEAU DRURY LLP
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25		Counsel for Plaintiff and the Putative Class
26		*Admitted <i>pro hac vice</i>
27	UNOPPOSED MOTION FOR EXTENSION OF TIME	
28	-3-	

CERTIFICATE OF SERVICE I hereby certify that on November 24, 2021, a true and correct copy of the above papers was served upon counsel of record by filing such papers via the Court's CM/ECF system. /s/ Stephen A. Klein UNOPPOSED MOTION FOR EXTENSION OF TIME -4-